

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**R2 Solutions LLC,**

**Plaintiff,**

**v.**

**Roku, Inc.,**

**Defendant.**

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**Civil Action No.: 6:21-CV-553-ADA**

**JURY TRIAL DEMANDED**

**ROKU, INC.'S SECOND UNOPPOSED MOTION TO EXTEND TIME TO MOVE,  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Roku, Inc., Defendant herein, without waiving any defenses described or referred to in Rule 12, Federal Rules of Civil Procedure, or any other available defenses, moves this Court to extend, for and additional fifteen (15) days, the time within which Defendant Roku is required to move, answer, or otherwise respond to Plaintiff's Complaint for Patent Infringement. In support of its motion Defendant Roku states the following:

1. On June 1, 2021, Plaintiff filed its Complaint for Patent Infringement alleging that Roku, Inc. violated certain asserted patents owned by Plaintiff.
2. On June 16, 2021, Defendant Roku was served with a copy of Plaintiff's Complaint.
3. Roku's original answer date would have fallen on July 7, 2021, right after a holiday.
4. Prior to July 7, Lead Counsel for Plaintiff agreed to a thirty (30) day extension of the applicable response deadlines to and including August 6, 2021.
5. Roku filed its unopposed motion to extend (Dkt. 10), which this granted by Text Order on July 9, 2021.

6. After Roku secured Lead Counsel, counsel for Plaintiff agreed to an additional extension of fifteen (15) days to allow Roku's Lead Counsel time to answer or otherwise respond.

7. The additional time to respond would reset the date for Roku to answer or otherwise respond to Plaintiff's Complaint to August 21, 2021.

8. The agreement to extend the deadline to answer or otherwise respond should not be construed as a waiver of Roku's rights or available defenses, including for instance, Roku's right to file appropriate counterclaims, assert affirmative defenses, or otherwise challenge the validity of the asserted patents.

WHEREFORE, Defendant Roku, Inc. respectfully requests that the time in which they are required to move, answer, or otherwise respond to Plaintiff's Complaint for Patent Infringement be extended to and include August 21, 2021.

Respectfully Submitted,

/s/ David N. Deaconson

**DAVID N. DEACONSON**

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Local Counsel for Roku, Inc.

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was served on all counsel of record via electronic transmission on July 30, 2021.

/s/ David N. Deaconson